DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND, MID-ATLANTIC
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OPTE3/18
December 1, 2014

Robert W. Schick, P.E.
Director, Division of Environmental Remediation
New York State Department of Environmental Conservation
Division of Environmental Remediation
Remedial Bureau A, 12th Floor
625 Broadway
Albany, New York 12233-7015

Dear Mr. Schick,

Subj: NAVAL WEAPONS INDUSTRIAL RESERVE PLANT (NWIRP) BETHPAGE (130003B), Operable Unit (OU)-2 REMEDY

Thank you for your letter of November 5, 2014 regarding the 2014 analytical sampling results from the monitoring wells that the Navy installed south of Northrop Grumman's (NG) On Site Containment (ONCT) System in Nassau County, NY. As you know, in accordance with the Navy's OU-2 2003 Record of Decision (Navy OU-2 ROD), the Navy has been conducting investigations of the OU-2 groundwater contamination plumes and has been focusing its investigation on three primary locations: the area south of the ONCT; the area south of Hempstead Turnpike; and the area south of Southern State Parkway. Information from each of these areas is integral to refining the conceptual model for the site, as well as optimizing the investigative and remedial efforts directed at the contamination.

In 2008, the Navy started installing additional vertical profile borings (VPBs) and monitoring wells to investigate the GM-75D2 area, which was an area suspected to pose a significant threat to downgradient public water supply wells. These investigations did not identify the presence of a "hot-spot" (i.e., the presence of site related contaminants in levels greater than 1 part per million [ppm] in three consecutive sampling events in any one well) in this area. Beginning in 2012, in response to increasing trichloroethene (TCE) concentrations at Bethpage Water District (BWD) Plant 6 public water supply well south of the ONCT, the Navy initiated a new investigation in the area of the well to identify the potential sources and pathways of site related contaminants. This ongoing investigation will determine whether the elevated concentrations of TCE have resulted from one or more of the following sources: the Bethpage Community Park Site plume to the east; a pre-ONCT release of volatile organic compounds (VOCs) from the Northrop Grumman property; and/or the potential leakage of the ONCT system from the north and west.

As your letter indicates, sampling conducted over the past several months has identified a new "hot-spot" of contamination. During the April 2014 Restoration Advisory Board Meeting, with NYSDEC

representatives in attendance, the Navy presented analytical results for a monitoring well and vertical profile borings in the area surrounding BWD Plant 6. In the presentation, the Navy stated that there were elevated concentrations of TCE (>1 ppm) in this area and that the Navy was going to conduct additional groundwater sampling. In accordance with the Federal Facility Site Remediation Agreement (FFSRA) and the Navy OU-2 ROD, the Navy conducted three consecutive sampling events from the 13 wells in the vicinity of VPB-139. Validated sampling results were submitted to NYSDEC on August 18, 2014, for the March 2014 sampling event; on October 21, 2014 for the June 2014 sampling event; and on November 3, 2014 for the September 2014 sampling event.

Further, while the FFRSA and Navy OU-2 ROD require the Navy to undertake additional response actions as necessary to address "hot-spot" contamination, the extent and magnitude of the contamination must first be ascertained in order to determine the appropriate response action, including, for example, the proper location for a mass removal system. The Navy is in the process of installing VPBs and monitoring wells that are necessary to perform this delineation and siting of the system. We are therefore unable to provide a schedule for a design work plan within the next 60 days. However, as you know, the nearest drinking water suppliers, Bethpage Water District and South Farmingdale Water District, already have equipment in place to treat this type of contamination should it reach their wells. Also, the water suppliers have contingency plans in place should additional treatment be needed. In addition, as NYSDEC indicated in its November 21, 2014 letter to NG, NG, as a potentially responsible party under CERCLA and former owner and operator of both the NWIRP and NG properties, is obligated to share the responsibility to address the contamination, including the tasks set forth in this letter, and to engage in joint settlement discussions with water districts.

While we cannot provide a design work plan at this time, the Navy is proceeding with the following actions to that end. First, as suggested in the 2012 Alternatives Report, the Navy is exploring with the BWD the possibility of using BWD Well 6-2 to treat the plume when the well is not being used for water distribution. The September 2014 report entitled "Pumping Test Results for BWD Well 6-2 Operable Unit No. 2-Groundwater" indicates that a 90-100% operation rate of BWD Well 6-2 would intercept the majority of the recently identified hot-spot. Second, based on the groundwater sampling results from March, June and September 2014, the Navy has reached a preliminary determination regarding the areal extent of the hot-spot. Once a final determination is made, subject to authorization and the availability of funds for this purpose, the Navy intends to design and implement a mass removal system to capture that hot spot. If BWD Well 6-2 is ultimately used to intercept the majority of the hot-spot, and if it is confirmed that there is a downgradient portion of this hot-spot that may not be addressed by operating BWD Well 6-2, then the Navy's design will take this into account. As a preliminary step, the Navy

is in the process of identifying two (2)-acre parcels of available land needed to construct a mass removal system similar to the GM-38 treatment system. To utilize this land, access agreements will be necessary.

In addition, the Navy continues to investigate other potential contribution from non-Navy sources to this plume; to conduct modeling and aquifer testing in conjunction with the U.S. Geological Survey; and to work with all affected and potentially affected water districts to appropriately address the contamination. The Navy is also committed to working with you, and welcomes NYSDEC's continuing input towards the mutual goal of ensuring continued safe drinking water in this area. If you have any questions, please contact the Navy's remedial project manager, Lora Fly, at (757) 341-2012.

Sincerely,

Nina M. Johnson

NINA M. JOHNSON
Northeast IPT
Environmental Business Line
Team Leader
By direction of the
Commanding Officer

Copy to:
NAVAIR, William Cords
NYSDEC, Steven Scharf
USEPA Region II, Carol Stein
Northrop Grumman, Ed Hannon
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